

INEOS ABS

INEOS ABS (USA) Corporation

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January 28, 2014

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Consent Decree Civil Action No. 1:09-CV-545
Effective Date February 4, 2010

Dear Sirs:

Please find attached the Quarterly Report for fourth quarter 2013. Please contact me at (513) 467-2184 or bradley.fattlar@ineos.com if you have any questions concerning the submitted information.

Respectfully Submitted,



Bradley Fattlar
Air Quality Engineer
INEOS ABS (USA) Corporation

cc: M. Palermo, USEPA Region 5
B. Weinburg, OEPA
G. Bachmann, Ohio AG
B. Pray (M. Kramer), SWOAQA

INEOS ABS (USA) CORPORATION'S ADDYSTON, OH PLANT
CONSENT DECREE QUARTERLY REPORT

Consent Decree Civil Action No. 1:09-CV-545

Effective Date

Reporting Period: 10/1/13 – 12/31/13

I. INTRODUCTION

The following report contains the required information about INEOS ABS' compliance activities associated with the requirements in Paragraph 50 a. and 50 b. in the Consent Decree.

II. LEAK DETECTION AND REPAIR (LDAR) REPORTING OBLIGATIONS

Per Appendix A of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

A. APPENDIX A COMPLIANCE STATUS REPORT

The first half 2013 compliance status report was submitted on July 26, 2013.

B. CORRECTIVE ACTION PLANS

The Corrective Action Plan for the 2013 external audit was submitted for approval on January 10, 2014.

C. CERTIFICATE OF COMPLIANCE

No certificate was required to be submitted during this period.

III. FLARE MONITORING INSTRUMENTS REPORTING OBLIGATIONS

Per Paragraph 23 of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

- Third Quarter 2013 Flare Monitoring report was submitted on October 11, 2013.

IV. NONCOMPLIANCE WITH CONSENT DECREE

A. Missed monitoring of DN3 connectors and difficult to monitor to components

At the end of the 2013 calendar year 993 connectors and difficult to monitor components were not monitored on their annual frequency. This was due to the installation of a capital project. The unit was shutdown on August 30th and scheduled to come back up in mid-October. The project was delayed into the 2014 calendar year thus the required components to measured annually were not monitored.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

Respectfully Submitted,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Eric Cassisa
Site Manager, NAFTA
INEOS ABS (USA) Corporation